UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
MARIA MIRANDA,  Plaintiff,  v.  CITY OF NEW YORK and NEW YORK CITY FIRE DEPARTMENT,  Defendants.	(PROPOSED) CASE MANAGEMENT PLAN CIVIL ACTION NO. 21 CV 714 (DLC)
The parties in the above-captioned action, has propose the following discovery plan:	aving conferred through counsel, hereby
Initial disclosures to be served by August 13, 2021.	2021
Initial discovery requests to be served by August 31 Fact discovery to be completed by February 15, 202 Expert reports, if any, due April 15, 2022.	
Rebuttal expert reports, if any, due May 16, 2022.  Expert depositions, if any, completed by June 17, 20	)22.
Dispositive motions due by April 1, 2022.	

Dated: New York, New York July 12, 2021

## JOSEPH & KIRSCHENBAUM LLP

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s/ Alana R. Mildner By: Alana R. Mildner

**Assistant Corporation Counsel** 

SO ORDERED:

Dated: July , 2021

DENISE L. COTE

United States District Judge